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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
MARIA CONSUELO MACHUCA  
ZUNIGA,  
a/k/a Maria Consuelo Gomez,  
a/k/a Maria Consuelo Machuca Gomez,  
Defendant.

No. CR 08-00087 RS

STIPULATION AND ~~[PROPOSED]~~  
ORDER EXCLUDING TIME

SAN JOSE VENUE

On March 13, 2008, the parties in this case appeared before the Court for an arraignment on an information. After the defendant was arraigned and entered a plea of not guilty, Assistant Federal Public Defender Lara Vinnard and the government agreed that the Court schedule the case for a status hearing on March 27, 2008. Reid Davis, Law Clerk for the United States Attorney's Office, then requested an exclusion of time under the Speedy Trial Act from March 13, 2008 until March 27, 2008 in order for the government to provide discovery to the defendant. The defendant, through AFPD Lara Vinnard, agreed to the exclusion. The undersigned parties

1 agree and stipulate that an exclusion of time is appropriate based on the defendant's need for  
2 effective preparation of counsel.

3 SO STIPULATED:

JOSEPH P. RUSSONIELLO  
United States Attorney

5 DATED: 3/25/08

4  
/s/  
SUSAN KNIGHT  
Assistant United States Attorney

7 DATED: 3/25/08

6  
/s/  
Assistant Federal Public Defender  
Counsel for the defendant

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11 Accordingly, for good cause shown, the Court HEREBY ORDERS that time be excluded  
12 under the Speedy Trial Act from March 13, 2008 to March 27, 2008. The Court finds, based on  
13 the aforementioned reasons, that the ends of justice served by granting the requested continuance  
14 outweigh the best interest of the public and the defendant in a speedy trial. The failure to grant  
15 the requested continuance would deny defense counsel reasonable time necessary for effective  
16 preparation, taking into account the exercise of due diligence, and would result in a miscarriage  
17 of justice. The Court therefore concludes that this exclusion of time should be made under 18  
18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv).

19 SO ORDERED.

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21 DATED: 3/26/08

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NANDOR J. VADAS  
United States Magistrate Judge